

Secretary should agree to this meeting with Eckstein.<sup>440</sup> By handwritten note, Sibbison advised Hoffman to avoid the meeting. In a June 16 e-mail, Sibbison elaborated on her warning:

We understand that the Secretary would like to meet with Mr. Paul Eckstein regarding the St. Croix Meadows Greyhound Racing Track in Hudson, Wisconsin. It is my understanding that Mr. Eckstein represents persons opposed to the acquisition of the dogtrack [sic] for Indian gaming purposes.<sup>441</sup>

Just as a head's [sic] up, please also be aware that, if memory serves, we declined a request for a meeting from former Congressman Jim Moody (a request forwarded by Senator Daschle), who represents persons in favor of acquisition of the dogtrack [sic]. One of the reasons given was that if the Secretary met with one side, he would have to also meet with the other side, and his schedule did not permit multiple meetings.

Handwritten comments on the e-mail – which Hoffman identified as Daniel-Davis's handwriting – indicate a “moratorium” on discussion of this issue “with anyone,” and that Babbitt would see Eckstein personally, but not relating to his client's interest in the Hudson application. A notation on another document also indicates that Babbitt would see Eckstein but not with his client, and that Sibbison would do a memorandum for the Secretary.<sup>442</sup>

During this timeframe, Babbitt also was contacted on behalf of the applicants by Jerome Berlin, a long-time Democratic fund-raiser from the Miami area. In late June 1995, Havenick

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<sup>440</sup> At that time, the Scheduling Office in the Office of the Secretary had responsibility for advising the Secretary which of the many invitations and requests he received for meetings and other appearances he should accept. The recommendations of the scheduling office were reviewed with the Secretary in a weekly scheduling meeting attended by the Secretary, his Chief of Staff, his personal assistant, and staff from the Scheduling Office. According to Hoffman and Laura Daniel Davis – then the Director of the Scheduling Office – the Scheduling Office's recommendations frequently were based on consultation with DOI staff believed to be knowledgeable about the requestor or the issues related to the request.

<sup>441</sup> Of course, this understanding was incorrect. Eckstein represented the applicant group.

<sup>442</sup> No such memorandum was produced by DOI, and Sibbison did not recall drafting any such memo.